REMARKS

Claims 1-29 are pending in the present application. Claims 4, 13, and 24 were canceled and the Claims 1, 8, 11, 16, 21 and 27 were amended. Reconsideration of the claims is respectfully requested.

Applicants have submitted proposed corrections to the drawing labeled Figure 5, indicating this drawing as prior art as suggested by the Examiner. These changes will be incorporated into a formal set of drawings upon approval of the proposed changes by the examiner.

35 U.S.C. § 102, Anticipation

Claims 1-29 are rejected under 35 U.S.C. § 102 as being anticipated by Mohan et al. This rejection is respectfully traversed.

Exemplary Claim 1 reads,

> 1. (Amended) A method of formatting content data for presentation on a client device, comprising:
> receiving a request for content data, the request having client device characteristic information;
> storing the client device characteristic information;
> generating generic content data; and
> transcoding said generic content data using said client device characteristic information to produce transcoded content data;
> whereby a user can receive a response formatted for a specific client device from a content provider that lacks content data so formatted.

It is submitted that Mohan does not reach these limitations because Mohan solves this problem by requiring the content provider to store a number of copies of the media content, where each copy is designed to be used on a given type of display device. For example, the content provider may store a copy of the media in a format for a personal computer (PC), a personal digital assistant (PDA), and cellular phone. The content provider must create and store multiple copies of the media, which can then be selected as needed and sent to the client. The problem is that many users want to access sites for which the content provider has not made provision for multiple display devices. In contrast, the instant application, in Claim 1, dynamically converts the information as needed, and does not rely on the content provider to take action. This dynamic response is shown in Claim 1 by the fact that the transcoding step of this claim uses the device

characteristics that have been received to perform the transcoding. Mohan has performed the transcoding prior to receipt of the request and the device characteristics. This is shown in the abstract of Mohan, which states,

> "The InfoPyramid provides a multi-modal, multi-resolution representation hierarchy for multimedia. The raw content components, such as text, audio, images, video, etc., are ingested by the system in InfoPyramids. Next, the transcoder populates the InfoPyramid structures with multi-resolution, multi-modal versions of the content. The number of possible renditions of the multimedia content is potentially combinatorial in the number of content elements. The customization module uses the client device characteristics as constraints to pick the best content representation. Content value is computed on the basis of publisher preference guidelines and the content transcoding."

As this quote demonstrates, Mohan uses the client device characteristics to choose the best of the already-created representations, not to perform the transcoding.

It is further submitted that Mohan actually teaches away from the present invention. This patent notes that the use of a transcoding proxy (as in the present invention) is "difficult to apply to many media types such as video and audio", can involve "legal issues arising from copyright that may preclude or severely limit the transcoding by proxy", and does not allow "content providers [to] have ... control over how their content will appear to different clients. Thus, Mohan does not teach use of the claimed invention; rather this patent teaches against on-the-fly transcoding.

All of the claims share the distinctions discussed above. In addition, numerous ones of the dependent claims recite further limitations not shown in Mohan.

Claims 3 and 23 each recite that the transcoding servlet obtains the client device characteristic information from the preamble servlet. In Mohan, the transcoding is performed, the request has not yet been made, so the specific client device characteristics are not available.

Claims 8, 17, and 28 each recite that the step of storing the client device characteristic information and the step of generating the content data are performed at approximately a same time. Mohan has already generated the content data in its various forms when the client device characteristics are received, so these steps are not performed at the same time.

Claims 19 and 29 each recite that the preamble servlet echoes the request to the content generator.

The rejection of all extant claims under 35 U.S.C. § 102 has been overcome.

Furthermore, Mohan does not teach, suggest, or give any incentive to make the needed changes to reach the presently claimed invention. As mentioned above, Mohan actually teaches away from the presently claimed invention because it teaches away from transcoding on the fly. Thus, this reference has been overcome.

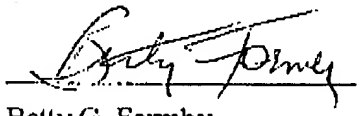
Conclusion

It is respectfully urged that the subject application is patentable over Mohan et al. and is now in condition for allowance.

The examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

DATE: Nov. 26, 2003

Respectfully submitted,



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